Equal Opportunities Policy
1. **Overall Policy Statement and Aims**

1.1 **Equality Statement:**

Consistent with Fighting Words’ philosophy of inclusive learning, trust and mutual respect, significant emphasis is placed on equality in our working environment. Engaging in the richness of diversity is central to the role of Fighting Words and in line with its core values.

Fighting Words is committed to equality of opportunity and positive action to promote equality of opportunity; equal opportunity is promoted as a means of developing the full potential of everyone involved in the organisation. The organisation believes that an Equal Opportunities Policy helps to ensure that there is no unjustified discrimination in the recruitment, retention, training and development of staff and volunteers.

Discrimination, victimisation or harassment on grounds including but not limited to gender, marital status, family status, sexual orientation, religion, age, disability, race\(^1\), or membership of the Traveller community, will not be tolerated.

Fighting Words does not discriminate against any employee or volunteer, or any applicant for employment or volunteering, because of gender, marital status, family status, sexual orientation, religion, age, disability, race, or membership of the traveller community.

Fighting Words is committed to best practice in providing equal opportunities for all job applicants and staff. The organisation believes that all people should be treated with respect and values diversity.

Fighting Words adheres to the Employment Equality Acts, 1998 – 2015 and the Equal Status Act, 2000 - 2015. To ensure that the policy is effective and no applicant or employee receives less favourable treatment, the organisation will promote equality of opportunity and prohibit discrimination across nine grounds:\(^2\)

- Gender
- Civil status
- Family status
- Sexual orientation
- Religion
- Age
- Disability
- Race
- Membership of the Traveller Community

1.2 **Policy Aims:**

The aims of our Equal Opportunity Policy are:

- To promote equality of opportunity throughout the organisation, the employment of staff, the involvement of volunteers, the participation of programme participants

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\(^1\) While the term ‘race’ is used here as it appears in Ireland’s equality legislation, Fighting Words recognises that it denotes a biological or scientific difference in human beings, a theory long discredited and to which the organisation does not subscribe.

\(^2\) Employment Equality Act 1998 to 2015
and the membership of the Board of Directors and other committees as may be determined.

- To eliminate all forms of discrimination, including direct, indirect and discrimination by association, in the workplace by implementing policies, strategies and procedures which promote equality of opportunity.

- To identify and remove barriers and redress any imbalances which prevent equality of opportunity.

- To prevent discrimination in any form, whether direct or indirect, against current or prospective staff, volunteers, as well as programme participants.

- To ensure that we fulfil our obligations under equality legislation.

- To engage in best practice in relation to equal opportunities.

2. Employment Policy & Volunteer Policy

2.1 It is the policy of Fighting Words that the principles and practices of equality of opportunity should apply to all conditions of service to our staff, including: recruitment, placement, selection, promotion, career development, training, pensions, pay and special leave entitlements.

2.2 No employee or volunteer will be intimidated, discriminated against or treated less favourably for taking or supporting an action under equality legislation including: raising a concern, complaining or assisting in an investigation.

2.3 All employees are required to comply with this policy and are responsible for ensuring its practical application. A breach of the Equal Opportunities Policy will be treated as misconduct under the organisation’s disciplinary procedures.

2.4 It is the policy of Fighting Words that the principles and practices of equality of opportunity should apply to all our volunteering agreement, including: recruitment, selection, training and placement.

3. Promotion of Equal Opportunities

3.1 To ensure that all Fighting Words staff and volunteers are aware of their obligations and rights under the Equal Opportunities policy, a system of policy implementation, information provision and training will be provided as required.

3.2 Fighting Words will ensure that the equality policy is communicated throughout the organisation, to all staff, volunteers, contractors, agents, suppliers and other relevant third parties in a range of formats through various media as deemed appropriate.

3.4 This policy will be displayed in the workplace and made accessible to all staff as part of the Staff Terms and Conditions of Employment. The policy will also be available on the shared drive of the computer network and available on the website – www.fightingwords.ie
3.5 We are committed to undertaking positive action across all the named grounds to promote equality of opportunity for all people in the workplace.

3.6 We will keep the addition of further grounds open to review.

4. **Equality Training**

4.1 Staff and volunteers will be encouraged, where possible and relevant, to attend training days / conferences on equality issues.

4.2 Training, information and briefings in relation to equality of opportunity will be provided to staff and volunteers, as necessary. Training will be organised in a manner that is equally open, available and accessible to all staff and volunteers.

5. **Policy Monitoring and Responsibility**

5.1 Day-to-day responsibility for equality matters will rest with the General Manager.

5.2 The General Manager is responsible for monitoring the effectiveness of the Equal Opportunities Policy within the organisation in order to:

- Ensure the policy is communicated to all staff.
- Ensure that a clear statement of Fighting Words’ commitment to equal opportunities and practices is clearly visible in all areas of the centre.
- Consult staff and volunteers where appropriate on issues relating to equal opportunities.
- Provide information and training to all staff and volunteers to ensure their understanding and commitment to the implementation and use of this policy.
- Provide human resources and managerial support on any issues/queries arising out of this policy.
- Identify and implement any positive action programmes as they arise to ensure equality of opportunity.
- Provide informal and confidential mechanisms of reporting to those who feel that they have been treated unfairly in the context of this policy.
- Provide a formal mechanism in the form of the grievance procedure contained in the Staff Terms and Conditions handbook as a means to formally investigate an alleged unfair treatment in the context of this policy.

6. **Recruitment and Advertising**

6.1 Recruitment and selection of suitably qualified staff. Interns and volunteers will be made from the widest possible field; positions will be advertised internally and externally.

6.2 Fighting Words reserves the right to conduct internal recruitment competitions for paid staff, in line with this policy and the Staff Terms and Conditions.
6.2 It is our policy to avoid displaying, intentionally or unintentionally, advertisements or wordings that suggest, implicitly or explicitly, that positions are not open to candidates from all the grounds covered by this policy.

6.3 All advertisements for employment and volunteer positions with Fighting Words and all information sent out to applicants for such posts will state clearly that: “Fighting Words is an Equal Opportunities Employer and welcomes applications from all sections of the community.”

6.4 Advertisements should not be confined to those websites and/or publications that exclude or disproportionately reduce the number of applicants on any of the named grounds. Where feasible, recruitment advertisements will be placed in specialist websites and/or publications aimed at groups that work with individuals from all named grounds.

6.5 All recruitment application forms will conform with all of the provisions of the Employment Equality Acts, 1998 to 2015 and to best practice in equal opportunities.

6.6 Fighting Words staff will be included as appropriate in the development of employment equality policies in relation to recruitment and advertising of jobs and their accessibility to people with different disabilities.

6.7 We will seek to ensure a creative approach in our advertising that affirms diversity and attracts the widest pool of applicants.

6.8.1 We will keep our public relations and communications under review to ensure they are aligned with our employment equality policy.

6.9 Fighting Words will take a periodic review of the recruitment process to ensure that no direct or indirect discrimination exist.

7. **Interview and Selection Process for Staff Positions**

7.1 Fighting Words will ensure that the organisation’s recruitment and selection procedures outlined below are consistent, provide equality of opportunity and are seen as fair by all staff and job applicants.

7.2 Individuals will be selected for employment based on merit. Job applicants must not be treated less favourably on any of the grounds covered by this policy, or be put at a disadvantage by unjustifiable conditions or requirements.

7.3 We will conduct recruitment interviews on the basis of ability, so that all candidates of equal merit have an equitable opportunity to compete.

7.4 We will strive to ensure a balance of persons from within all the grounds and to achieve gender balance on all our interview boards. In addition, we will provide all members of interview panels with detailed guidance/training in non-discrimination and equal opportunity issues in relation to recruitment.

7.5 We are committed to an agreed objective system of rating candidates for recruitment by experience, skill, qualifications, or job record as appropriate and
relevant.

7.7 A person specification will be drawn up for each employment and volunteer position to be filled describing: the experience, skills, qualifications and knowledge required to carry out the job satisfactorily. This will ensure that before the recruitment process begins, clear criteria are agreed upon by which all applicants are assessed.

7.8 Written documentation will be maintained of the assessments made on applicants during the interview process for at least 12 months following the distribution of notices to unsuccessful candidates. The written record for the successful candidate will be placed in the personnel file.

7.9 Short-listing for interviews will be based upon job related criteria.

7.10 We will make appropriate adjustments to the recruitment process that will enable candidates, with or without disabilities, to compete equally for jobs.

7.11 We will identify contact points to ensure that we have ongoing access to the knowledge required to make reasonable accommodation for people with disabilities.

7.12 Any candidate who feels that she / he has been unlawfully discriminated against has a right of complaint which can be exercised by writing to the Board of Directors. All such complaints of alleged discrimination will be fully investigated by management in accordance with best practice procedures and appropriate actions will be taken where necessary.

8. Orientation / Induction for Staff and Volunteers

8.1 Fighting Words is committed to make all new staff and volunteers feel welcome and will provide all the assistance needed for a smooth workplace induction.

8.2 We will introduce a pro-active equality approach in orientation programmes for new staff and volunteers, as well as, undertaking awareness raising and equality skills training activities with existing staff.

8.3 All volunteer induction materials will state explicitly that volunteering policies are covered by the Fighting Words equality policies.

8.4 We will take steps to ensure that staff and volunteers, for whom English is not their first language, understand workplace rules and procedures.

8.5 The General General Manager will explore necessary adjustments with staff or volunteers who have disabilities to access any necessary advice or support and to secure implementation of such adjustments.

8.6 Staff and volunteers will be provided with information to increase their understanding of adaptations and adjustments required in the process of recruitment and the continued employment of staff with disabilities.
9. **Training and Staff Development**

9.1 It is the policy of Fighting Words to encourage retention and professional development of staff and volunteers within the organisation regardless of their gender, marital status, family status, religious belief, race, age, sexual orientation, disability, or membership of the Traveller community.

9.2 We are committed to monitoring the promotion process where feasible to assess the equality of opportunity in this area.

10. **Work – Life Balance**

10.1 Consistent with the justifiable needs of the work, efforts will be made to enable staff to reconcile work with domestic responsibilities and choices.

10.2 Fighting Words provides initiatives to support work-life balance through, for example:

- Adoptive, maternity and paternity leave
- Flexible working hours, part-time working, reduced contractual hours
- Career breaks, special leave, carer’s leave, parental leave

10.3 Reasonable effort will be made within existing arrangements to enable staff with particular cultural and religious needs to reconcile their work and private life.

10.4 Staff who avail of family-friendly work arrangements will not be discriminated against and will be treated equally with other staff.

11. **Performance Management and Organisational Planning**

11.1 Performance management and organisational planning meetings will be conducted on a basis that is non-discriminatory to all staff. Performance management shall be based on an individual’s capabilities, performance or evidence of potential.

11.2 To ensure equality between all staff, the principle and practice of equal pay will be respected and kept under review. Fighting Words believes that staff should receive equal pay for the same or broadly similar work, for work that rates as equivalent and for work of equal value.

11.3 We shall take steps, where appropriate, that staff for whom English is not their first language, understand all disciplinary and related procedures.

12. **Sexual Harassment / Harassment\(^3\) - Applicable to Staff and Volunteers**

12.1 Fighting Words believes that all people have the right to be treated with dignity and respect and in no way discriminated against, sexually harassed or harassed in the course of their work.

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\(^3\) Please note that the procedures for investigating sexual harassment and harassment are the same as for the Bullying Policy and Procedure, found in the Fighting Words Staff Terms and Conditions.
12.2 Discrimination is defined as the treatment of a person in a less favourable way than another person is, has been or would be treated in a comparable situation on any of the nine protected grounds.

In addition to direct, overt discrimination, other forms are also covered by this policy:

**Indirect discrimination** happens where there is less favourable treatment in effect or by impact. It happens where people are, for example, refused employment or training not explicitly on account of a discriminatory reason but because of a provision, practice or requirement puts people who belong to one of the grounds covered by the policy at a particular disadvantage, except where the provision is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

**Discrimination by Association** happens where a person associated with another person (belonging to a specified ground) is treated less favourably because of that association.

12.2 Fighting Words is committed to ensuring that the workplace is free from sexual harassment and harassment.

12.3 This policy applies to all staff, volunteers, contract workers, programme participants, vendors and members representing Fighting Words.

12.4 The policy extends beyond the workplace to meetings and training and to work-related social events.

12.5 We will ensure that complaints will be treated with fairness and sensitivity and in as confidential a manner as possible.

12.6 Victimisation of any party to a complaint, or of an employee / non – employee who takes action, supports action or gives notice of intention to take / support an action under equality legislation in relation to sexual harassment or harassment will be subject to disciplinary action.

12.7 Sexual harassment and harassment by staff and volunteers such as contract workers, programme participants and business contacts **will not be tolerated** and could lead to disciplinary action (in the case of staff) and other sanctions, for example the suspension of contracts or services or the exclusion from premises (in the case of volunteers).

12.8 No employee or volunteer will be treated less favourably because he/she has rejected, tolerated or accepted the sexual harassment or harassment (e.g. The fact that an individual has previously agreed to the behaviour does not stop him/her from deciding that it has now become unwelcome).

12.9 It is the responsibility of the employee or volunteer to decide what behaviour is unwelcome, irrespective of the attitude of others to the matter.
12.10 To ensure this policy is effective, Fighting Words will:

- Provide a good example by treating all persons in the course of their work and volunteering with courtesy and respect.
- Be vigilant for signs of harassment and take action before a problem escalates.
- Respond quickly and sensitively to an employee or volunteer who makes a complaint of harassment. We will handle all complaints in as confidential a manner as possible.
- Explain the procedures to be followed if a complaint of sexual harassment or harassment is made. We will provide all staff and volunteers with copies of this procedure.
- Ensure that an employee making a complaint is not victimised for doing so.
- Monitor and follow up the situation after a complaint is made so that the sexual harassment or harassment does not recur.

13. Sexual Harassment

13.1 Sexual harassment is defined as any:

- unwelcome act of physical intimacy
- unwelcome request for sexual favours
- other act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material that is unwelcome and could reasonably be regarded as sexually offensive, humiliating or intimidating.

13.2 Many forms of behaviour can constitute sexual harassment. It includes examples like those contained in the following list, although it must be emphasised that the list is illustrative rather than exhaustive. A single incident may constitute sexual harassment.

13.2.1 Physical conduct of a sexual nature - This may include unwanted physical contact such as unnecessary touching, patting, pinching or brushing against another person’s body, assault and coercive sexual intercourse.

13.2.2 Verbal conduct of a sexual nature - This includes sexual advances, offensive flirtations, suggestive remarks, innuendos or lewd comments. Propositions or pressure for sexual activity and continued suggestions for social activity outside the workplace (after it has been made clear that such suggestions

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For more information, see [https://www.citizensinformation.ie/en/employment/equality_in_work/](https://www.citizensinformation.ie/en/employment/equality_in_work/)
are unwelcome or unwanted) also constitute verbal conduct of a sexual nature.

13.2.3 **Non-verbal conduct of a sexual nature** - This may include the display of pornographic or sexually suggestive pictures, objects, written materials, emails, text-messages or faxes. It may also include leering, whistling or making sexually suggestive gestures.

13.2.4 **Sex-based conduct** - This would include conduct that denigrates, ridicules, intimidates or is physically abusive to an employee because of his or her sex such as derogatory or degrading abuse or insults that are gender-related.

14. **Harassment**

14.1 Harassment is any act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material if the action or conduct is unwelcome to the staff and could reasonably be regarded as offensive, humiliating or intimidating.\(^5\)

14.2 The harassment is based on the relevant characteristic of the staff whether it is the employee’s:

- **Gender** – A man, woman or a transsexual person.
- **Civil Status** – Single, married, separated, divorced or widowed.
- **Family status** – Responsibility as a parent or as a person *in loco parentis* in relation to a person under 18, or as a parent or the resident primary carer of a person over 18 with a disability which is of such a nature as to give rise to the need for care or support on a continuing, regular or frequent basis.
- **Sexual orientation** – Heterosexual, homosexual or bisexual orientation.
- **Religious belief** – Includes different religious background or outlook, including absence of religious belief
- **Age** – Between the ages of 18 and 65 (or from 15 in relation to vocational training)
- **Disability** – Broadly defined includes people with physical, intellectual, learning, cognitive or emotional disabilities and a range of medical conditions.
- **Race** – Includes race, skin colour, nationality or ethnic origin.
- **Membership of the Traveller Community** – “Traveller community” means the community of people who are commonly called Travellers and who are identified (both by themselves and others) as people with a shared history, culture and traditions including, historically, a nomadic way of life on the island of Ireland.

\(^5\) Section 14-Code of Practice on Sexual Harassment and Harassment at Work – Equality Authority
14.3 The protection of the Act extends to situations where the employee does not have the relevant characteristic but the harasser believes that he/she has that characteristic, for example, if the harasser thought the employee was gay and the employee wasn’t.

14.4 Many forms of behaviour may constitute harassment including:

- Verbal harassment - jokes, comments, ridicule or songs
- Written harassment - including text messages, emails, faxes or notices
- Physical harassment - jostling, shoving or any form of assault
- Intimidating harassment - gestures, posturing or threatening poses
- Visual displays such as posters, emblems or badges
- Isolation or exclusion from social activities
- Pressure to behave in a manner that the employee thinks is inappropriate, for example being required to dress in a manner unsuited to a person’s ethnic or religious background.

15. **Common Elements**

15.1 The definitions of sexual harassment and harassment have several common concepts.

*Unwelcome conduct*

The Employment Equality Act does not prohibit all relations of a sexual or social nature at work. To constitute sexual harassment or harassment the behaviour complained of must firstly be unwelcome. It is up to each employee to decide (a) what behaviour is unwelcome, irrespective of the attitude of others to the matter and (b) from whom, if anybody, such behaviour is welcome or unwelcome, irrespective of the attitudes of others to the matter. The fact that an individual has previously agreed to the behaviour does not stop him/her from deciding that it has now become unwelcome. It is the unwanted nature of the conduct that distinguishes sexual harassment and harassment from friendly behaviour that is welcome and mutual.

15.2 The intention of the perpetrator of the sexual harassment or harassment is irrelevant. The fact that the perpetrator has no intention of sexually harassing or harassing the employee is no defence. The effect of the behaviour on the employee is what is important.

15.3 Staff and volunteers of Fighting Words may contribute to achieve an environment free from sexual harassment and harassment through cooperation with management. Sexual harassment and harassment by staff or volunteers constitutes misconduct and may lead to disciplinary action.
15.4 Any acts of sexual harassment and/or harassment by non-staff such as contract staff, programme participants and business contacts will not be tolerated and may lead to termination of contracts or suspension of services, or the exclusion from a premises or the imposition of other sanctions (as appropriate).6

16. Policy Promotion

16.1 Fighting Words will endeavour to ensure that this policy is communicated effectively to all management, staff, volunteers, service users, project users and other business contacts, including those who supply and receive goods and services.

16.2 Fighting Words will display this policy on notice boards.

16.3 Fighting Words is committed to monitoring incidents of sexual harassment and harassment. Information will be used to evaluate the policy and procedures at regular intervals.

16.4 Fighting Words will endeavour to arrange for regular training on the prevention of sexual harassment, harassment and bullying for managers, staff and interns/volunteers.

16.5 New staff and volunteers will be trained at induction or through appropriate awareness raising initiatives.

16.6 Any complaints of sexual harassment or harassment must be taken seriously and handled in a sensitive, supportive manner. Moreover, any retaliation or retribution of any kind against a person who complains about sexual harassment or harassment is strictly forbidden. Where a complaint has been found to be made falsely and maliciously, however, the disciplinary procedure shall be imposed upon the person(s) who made the complaint.

17. Complaints Procedure

17.1 Any complaint of sexual harassment and/or harassment will be treated in as confidential a manner as possible. All complaints will be handled through the official grievance procedure.

17.2 An employee will not be victimised or subject to sanction for making a complaint in good faith, or for giving evidence in proceedings, or by giving notice of intention to do so.

17.3 Types of Complaints:

Informal: An employee, volunteer, member, contract staff, service user or project user who is being sexually harassed or harassed, should first attempt to resolve the problem informally if this is possible. The individual should explain clearly to the person engaging in the unwanted conduct that the behaviour in question is not welcome, that it offends them or makes them uncomfortable. This is likely to

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6 Section 15 – Code of Practice on Sexual Harassment and Harassment at Work – Equality Authority
produce solutions that are speedy, effective, and minimise embarrassment and the risk of breaching confidentiality.

If a person finds it difficult to approach the alleged perpetrator directly, then the individual should seek help and advice on a confidential basis from his/her supervisor or the General Manager.

Having consulted with a colleague or the General Manager, the complainant may request the assistance of that colleague or manager in raising the issue with the alleged perpetrator(s). In this situation, the approach of the consulted colleague/manager should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal, low-key manner.

A complainant may decide, for whatever reason, to bypass the informal procedure. Choosing not to use the informal procedure will not reflect negatively on a complainant in the formal procedure. It is recognised that it may not always be practical to use the informal procedure, particularly where the bullying is serious or where the people involved are at different levels in the organisation. In such instances, the individual should use the formal mechanism set out below.

**Formal:** If the problem continues or it is not appropriate to resolve the problem informally, (for example, because of the severity of the harassment) it will be necessary to process the complaint through the grievance procedure outlined below.

Complaints should be made to her/his supervisor or the General Manager as soon as possible. Where the supervisor or the General Manager is involved as alleged harasser or as victim, the complaint should be made to the Chief Executive Officer. Where the Chief Executive Officer is involved as alleged harasser or victim, the complaint should be made to the Chairperson of the Board of Directors. If the complainant believes that it would not be appropriate to make a complaint to any member of the management team, s/he should discuss the matter with the Chairperson of the Board of Directors with a view to establishing an effective method of making a complaint.

In the interests of natural justice, the alleged harasser will be notified in writing of the nature of the complaint, given a copy of the allegation, informed of his or her right to representation and will be given every opportunity to rebut the detailed allegations made.

**18. Investigation of Complaints**

18.1 Fighting Words will ensure that the investigation of any complaint is handled with sensitivity and with respect for the rights of both the complainant and the alleged harasser. A written record will be kept of all meetings and investigations.

18.2 The investigation will be handled in an independent and objective manner.

18.3 No fewer than two people, who have been appropriately trained to conduct an investigation in a sensitive and objective manner, will carry out an investigation of
the complaint. The investigators shall be agreed by union and management where appropriate.

18.4 Fighting Words will strive to ensure that any investigative panel has gender balance where appropriate.

18.5 The complaint shall be in writing. Both parties will be given full details in writing of the nature of the complaint as well as the response, including written statements and any other documentation or evidence, including witness statements, interview notes or records of meetings held with the witnesses.

18.6 The alleged harasser will be given time to consider the documentation and an opportunity to respond.

18.7 Separate hearings for both parties to the complaint shall be held, as well as with any witnesses. Both parties have the right to be accompanied and/or represented, by a representative, friend or colleague.

18.8 Confidentiality will be maintained to the greatest extent in keeping with a fair investigation.

18.9 The investigation, having considered all of the evidence before it and the representations made to it, will produce a written report to both parties outlining its findings and the reasons for its final decision. The report should be prepared citing the details of the complaint, the response of the alleged harasser, the results of the investigation and the conclusion, and a copy should be sent to both the complainant and the alleged harasser. Both parties will be given the opportunity to comment on the conclusions of the investigation team.

18.10 If the examiner(s) conclude that there is not enough evidence to sustain the allegation of harassment or sexual harassment, both parties must be informed as soon as possible that the matter will not proceed any further.

18.11 If the allegation is sustained, the examiners will report their findings, including recommended appropriate disciplinary measures, to the Chief Executive Officer, who is responsible for making a final decision and communicating it in writing to the line manager and both parties. In cases involving the Chief Executive Officer, the findings of the report will be filed with the Chairperson of the Board of Directors, who shall make the final decision and report it to the relevant line manager and both parties.

18.12 Disciplinary action shall be taken in sustained complaints in line with the organisation’s disciplinary procedures. Regular checks will be made by one of the investigators to ensure that the bullying has stopped and that there has been no victimisation for referring a complaint in good faith. Retaliation of any kind against an employee for complaining or taking part in an investigation concerning bullying at work is a serious disciplinary offence

18.13 If the complaint is upheld against a non-employee, the report will recommend appropriate sanctions that could extend to:
19. **Appeals Procedure**

19.1 If the complainant wishes to appeal the Chief Executive Officer’s decision, an appeal can be brought to the Chairperson of the Board of Directors who will consider the findings and subsequent solutions with the aim of resolving the complaint. Should the complaint involve the Chief Executive Officer, the appeal should be made to the Vice Chairperson or an independent third party to be appointed by the Vice Chairperson or some other member of the Board of Directors who has not been involved with the initial complaint.

20. **Disciplinary Procedure**

20.1 See Fighting Words’ Disciplinary Procedures in the Staff Terms and Conditions and/or the Volunteer Policy.

21. **Further Information**

21.1 All questions relating to the execution or interpretation of this policy and procedures contained within it should be referred to the General Manager.

22. **Policy Review**

This policy shall be reviewed annually. The next review will take place in July 2020.